



National
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Docket No. 05-015-1
Regulatory Analysis and Development
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National Animal Identification System; Notice of Availability of a Draft Strategic Plan and Draft Program Standards

The National Sheep Industry Improvement Center (NSIIC) is pleased to provide comment on the proposed Draft Strategic Plan for the National Animal Identification System published in the Federal Register on May 6, 2005. The NSIIC is authorized under 7 U.S.C. 2008j and our mission is "To assist the US Sheep and Goat Industries by strengthening and enhancing the production and marketing of sheep, goats, and their products in the United States." The management of NSIIC is vested in a Board of Directors that is appointed by, and reports to the Secretary of Agriculture. The Board of Directors consists of 7 voting members chosen from the sheep and goat industries. The Under Secretaries for Rural Development and Research, Education and Economics also serve as non-voting members of the Board of Directors.

We recognize the national and international driving forces which are behind the need for a timely trace back of animals for food safety and disease control/eradication. The sheep industry in particular is well aware of these issues as they have struggled with an identification program for the scrapie program in the past. We are pleased that you have recognized that your task is to balance the need for an effective and reliable identification system with the need for it to be cost effective and user friendly for those that will bear the direct and indirect cost of implementation.

Mandatory Timeline

It has been the experience of those experts involved in the scrapie program that the technology to have individual identifications that is fast and reliable does not exist for the sheep and goat industries. Therefore it should not be mandatory by 2009 but rather move forward as the technology becomes available.

Animals Identified before commingling and Animals identified before entering commerce

We support a group ID for lambs under 18 months of age. Lamb by definition must be an animal under the age of 12 months. The cost in labor and the expense of tags is going to be a determining factor in the success of this program. The system must be market driven and the technology must be in place to move large volumes of animals

very quickly. In the western US and with lamb feeders their livelihood depends on moving thousands of lambs in a day.

Timeline

Each of the species groups that make up the stakeholders in this process are starting at a different point, with different technologies. In our case we are working with both the sheep and goat industries. The sheep industry is a well established industry with existing infrastructure that is shrinking and has the scrapie program where many lessons in animal identification have already been learned. In addition to the niche marketing they have well defined marketing channels that are well organized and they are well organized through trade associations, marketing groups and long standing alliances that will enhance communication and education needs. The meat goat industry on the other hand is in many respects the exact opposite. It is a rapidly expanding industry with unique niche markets. Even putting these two species on the same timeline would prove unwise. A timeline that the goat industry might perceive as aggressive might be acceptable for the sheep industry. And to further muddy the water, that difference might be true between the meat goat industry and the dairy goat industry.

Species specific timeline

Species should not all be set on the same timeline. The technologies for individual animal identification and the existing programs between species are simply too great for a one size fits all approach.

Data Submission

Many of the sheep and goat industries marketing is from small producers to small niche markets. The data collection system must be set up to collect only the data needed and done as simply as possible or these sales will simply go unreported or that market will just be driven underground.

Confidentiality

Overstating the need for confidentiality of the information gathered on individual or groups of animals can not be overstated. Confidentiality is the key for getting the buy-in of the stakeholders and sustain the integrity of the ID program.

Minimize Burden and Database

We support a central data base in USDA that could be coordinated with state Agriculture Departments. This is the only way to uniformly gather only the data that is needed and secure the level of confidentiality demanded by the livestock industry.

We support the use of the contact information for the owner/manager/agent as the premises. This would in effect mean that there would be no change of premises until there is a change of ownership.

We appreciate the opportunity to comment on these critical issues and look forward to working with you in your daunting task to balance the emerging need for trace back with the time and expense that this will cost the stakeholders. If you have any questions or comments, please contact Jay Wilson at the Washington DC office.

